1 2 3 4 5 6 7	QUINN EMANUEL URQUHART & SULLIVA Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com Melissa Baily (Bar No. 237649) melissabaily@quinnemanuel.com Lindsay Cooper (Bar No. 287125) lindsaycooper@quinnemanuel.com 50 California Street, 22 nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700 Attorneys for GOOGLE LLC	AN, LLP		
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10	SAN FRANCISCO DIVISION			
11	GOOGLE LLC,	CASE NO. 3:20-cv-06754-WHA		
12	Plaintiff,	DECLARATION OF LINDSAY COOPER IN SUPPORT OF GOOGLE LLC'S		
13	vs.	ADMINISTRATIVE MOTION TO FILE UNDER SEAL PORTIONS OF ITS		
14	SONOS, INC.,	SECOND AMENDED COMPLAINT		
15	Defendant.			
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28		CASE NO. 3:20-CV-06754-WHA		
	DECLARATION OF LINDSAY COOPER IN SUPPORT OF GOOGLE'S ADMINISTRATIVE			

MOTION TO FILE UNDER SEAL PORTIONS OF ITS SECOND AMENDED COMPLAINT

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I, Lindsay Cooper, declare and state as follows:

- 1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC ("Google") in this matter. I make this declaration in support of Google's Administrative Motion to File Under Seal Portions of its Second Amended Complaint ("SAC") ("Google's Administrative Motion"). If called as a witness, I could and would testify competently to the information contained herein.
- 2. Google's Administrative Motion seeks an order sealing the portions of the documents listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google's SAC	Portions highlighted in yellow	Google
SAC Exhibit 2	Entire Document	Google
SAC Exhibit 3	Entire Document	Google
SAC Exhibit 4	Entire Document	Google
SAC Exhibit 5	Entire Document	Google
SAC Exhibit 6	Entire Document	Google

3. The portions of Google's SAC highlighted in yellow as well as Exhibits 2 and 3 contain confidential business information and terms to confidential agreements that are not public. Public disclosure of this information would harm Google's competitive standing and its ability to negotiate future agreements by giving competitors access to Google's highly confidential business thinking and asymmetrical information about Google's collaboration strategies to other entities. If such information were made public, I understand that Google's competitive standing would be significantly harmed. A less restrictive alternative than sealing the highlighted portions would not be sufficient because the information sought to be sealed is Google's proprietary and confidential business information but is necessary to the claims in Google's SAC.

1	4. Exhibits 4, 5, and 6 contain references to Google's confidential business information		
2	and trade secrets, including details regarding source code, architecture, and technical operation of		
3	Google's products. The specifics of how these functionalities operate is confidential information that		
4	Google does not share publicly. Thus, public disclosure of such information could lead to competitive		
5	harm to Google as competitors could use these details regarding the architecture and functionality of		
6	Google's products to gain a competitive advantage in the marketplace with respect to their competing		
7	products. A less restrictive alternative than sealing Exhibits 4, 5, and 6 would not be sufficient		
8	because the information sought to be sealed is Google's confidential business information and trade		
9	secrets but is integral to Google's claims in the SAC.		
10	I declare under penalty of perjury that to the best of my knowledge the foregoing is true and		
11	correct. Executed on February 4, 2022, in Mill Valley, California.		
12	DATED: February 4, 2022		
13	By: /s/ Lindsay Cooper		
14	Lindsay Cooper		
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CASE NO. 3:20-CV-06754-WHA

ATTESTATION I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Lindsay Cooper has concurred in the aforementioned filing. DATED: February 4, 2022 /s/ Charles K. Verhoeven Charles K. Verhoeven